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**Monsanto**

PERFORMANCE PRODUCTS DIVISION

**Environmental Cleanup Office**

**The Chemical Group**  
State Highway 34 North  
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Soda Springs, Idaho 83276  
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September 30, 1996

**Confidential Business Information**

THB 4/24/97

Mr. Tim Brincefield  
Remedial Project Manager  
USEPA Region 10  
1200 Sixth Avenue (HW-113)  
Seattle, Washington 98101

Dear Mr. Brincefield:

The purpose of this letter is to provide EPA Region 10 with comments regarding the July 29, 1996 Proposed Plan for the Monsanto Elemental Phosphorus Plant located in Caribou County, Idaho. These comments are intended to be constructive and in support of the preferred alternative provided in the plan and are submitted to you as CONFIDENTIAL BUSINESS INFORMATION (CBI), given EPA's experience at other S.E. Idaho Superfund sites and attempts by residents abutting Monsanto's site to increase the price of implementing the institutional remedy,

Page 12, Paragraph 7: As raised by the public during the August 13, 1996 meeting, a sensible, protective, and workable definition of "a reasonable time frame" is that period of time until a firm commitment has been made to construct a residence on the currently impacted agricultural property. This definition is appropriate because both EPA's and Monsanto's risk assessments indicate there are no current human health threats associated with these lands; the uncertainty of EPA's risk estimates for future scenarios; and because of the very unlikely possibility that there will be any future residential development on these agricultural lands. This definition in no way decreases Monsanto's commitment to complete the implementation of the land use restriction (or property purchase) in a timely, cost effective manner and proceed with the delisting of the site from the NPL. It does ensure that unnecessary or exorbitant costs associated with the preferred alternative in the proposed plan can be avoided.

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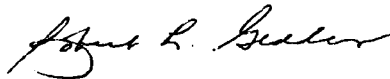


A shorter time period to complete the implementation of the land use restriction or to negotiate purchase of the impacted lands eliminates the opportunity to establish fair market values for the properties in question. This is apparent based upon negotiations currently underway and leverage being implemented regarding land values at this and other S.E. Idaho superfund sites.

Monsanto is willing, as previously indicated, to meet with EPA Region 10 to discuss past and current land acquisition efforts. At that time we can discuss recent responses/offers based on what land owners deem possible considering the very short time frame, that a "reasonable time frame" may imply.

If the above concerns are addressed, it is Monsanto's opinion that a contingency remedy for this site is not necessary. If, however, as future reviews of this site are made, and a contingency is deemed to be necessary the appropriateness of any such action at that point in time can be evaluated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert L. Geddes".

Robert L. Geddes  
Project Coordinator